

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

LATOYA BROWN; LAWRENCE BLACKMON  
HERBERT ANTHONY GREEN; KHADAFY MANNING;  
QUINETTA MANNING; MARVIN MCFIELD; NICHOLAS  
SINGLETON; STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER, individually and on  
behalf of a class of all other similarly situated,

PLAINTIFFS

v.

CIVIL ACTION NO. 3:17-CV-347-CWR-LRA

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his official capacity; and  
MADISON COUNTY SHERIFF'S DEPUTIES JOHN  
DOES #1 through #6, in their individual capacities,

DEFENDANTS

---

DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION FOR LEAVE  
TO FILE SECOND AMENDED COMPLAINT

---

COME NOW defendants Madison County, Mississippi and Sheriff Randall C. Tucker, in his official capacity, by and through the undersigned counsel, and state that they do not oppose Plaintiffs' Motion for Leave to File a Second Amended Complaint [Docket # 345].

THIS the 26th day of February, 2019.

Respectfully submitted:

**MADISON COUNTY, MISSISSIPPI and  
SHERIFF RANDALL C. TUCKER, IN  
HIS OFFICIAL CAPACITY**

BY: Michael B. Wallace (MSB #6904)  
Charles E. Ross (MSB #5683)  
James E. Graves (MSB #102252)  
Charles E. Cowan (MSB #104478)  
WISE CARTER CHILD & CARAWAY, P.A.  
Post Office Box 651  
Jackson, Mississippi 39205-0651  
Telephone: 601-968-5534  
Facsimile: 601- 944-7738

mbw@wisecarter.com  
cer@wisecarter.com  
jeg@wisecarter.com  
cec@wisecarter.com

and

T. Russell Nobile (MSB #100682)  
WISE CARTER CHILD & CARAWAY, P.A.  
2510 14<sup>th</sup> Street, Suite 1125  
Gulfport, Mississippi 39501  
Telephone: 228-867-7141  
Facsimile: 228-867-7142  
trn@wisecarter.com

OF COUNSEL:

Rebecca B. Cowan (MSB #7735)  
CURRIE JOHNSON & MYERS, P.A.  
1044 River Oaks Dr.  
Jackson, MS 39232  
P.O. Box 750  
Jackson, Mississippi 39205-0750  
Telephone: 601-969-1010  
Facsimile: 601-969-5120  
bcowan@curriejohnson.com

Katie Bryant Snell (MSB# 103607)  
KATIE BRYANT SNELL, PLLC  
P.O. Box 3007  
Madison, Mississippi 39130-3007  
Telephone: 601-460-9800  
katie@katiebryantsnell.com

J. Lawson Hester (MSB #2394)  
Jason Edward Dare (MSB #100973)  
PETTIS, BARFIELD & HESTER, P.A.  
4450 Old Canton Road, Suite 210  
Jackson, Mississippi 39211  
Telephone: 601-987-5300  
lhester@pbhfirm.com  
jdare@pbhfirm.com